
Audit and Assurance Committee Meeting

Date of Meeting	Tuesday 15 March 2022
Paper Title	Review of GDPR
Agenda Item	13
Paper Number	AAC3-H
Responsible Officer	Jim Godfrey, Finance and Resources Director
Status	Disclosable
Action	For Noting

1. Executive Summary

- 1.1** The purpose of this report is to provide an update of work in respect of the GDPR action plan. Mairead Wood, GCRB's Data Protection Officer, will attend the meeting to introduce the report and answer any questions.

2. Recommendations

- 2.1** The Committee is invited to **note** the update in respect of the GDPR action plan.

3. Report

- 3.1** GDPR is an important issue for GCRB, and all three colleges in Glasgow. Previous reports have outlined progress in respect of GDPR and the collaborative approach to Data Protection.
- 3.2** Members may recall that the action plan was provided to this committee in October 2019. A progress review, after the first 12 months, was also provided to the committee in October 2020.
- 3.3** Under the guidance of Mairead Wood (Data Protection Officer), the Executive Team has been working to implement the agreed action plan.

4. Risk and compliance implications

- 4.1** The approach outlined above has enabled GCRB, and the Glasgow Region, to address the risks posed by the regulations in respect of Data Protection and GDPR. In particular, the risk that “There is a breach of legislation/guidance/code of practice and this results in a failure of governance”.

5. Financial and resources implications

- 5.1** There are no direct resource implications as a result of this report. There may be resource implications as a result of subsequent action and this will be identified within any future report.

6. Equalities implications

- 6.1** There are no equalities implications as a direct result of this report.

7. Learner implications

- 7.1** Compliance with relevant legislation is clearly an obligation for GCRB. Whilst GDPR creates an additional administrative burden this is offset by some benefits that might contribute to the achievement of the region’s ambitions. Such benefits may include; improved learner confidence and enhanced cyber security.

Report for Audit Committee

GLASGOW COLLEGES REGIONAL BOARD
DR MAIREAD WOOD
01/03/22

1. Background

Data protection continues to evolve, with changes being affected by Brexit and the publication of new frameworks including the Information Commissioner's Office (ICO) Accountability Framework and Scottish Government's Cyber Resilience Framework. The National Cyber Security Centre (NCSC) has advised organisations to act following Russia's attack on Ukraine (this would apply to CoGC as the third party supplier of GCRB's IT) - [NCSC advises organisations to act following Russia's... - NCSC.GOV.UK](#).

HEFESTIS are preparing guidance on alignment of the Accountability Framework and Cyber Resilience Framework which will be shared with its members. City of Glasgow College (CoGC) provide IT infrastructure to GCRB, and therefore responsible for addressing the Cyber Resilience Framework. The DPO will support GCRB to complete the Accountability Framework and can support GCRB to work with CoGC on the Cyber Resilience Framework if/as required.

2. Policies and procedures

All data protection guidance and procedures are in place. CoGC is responsible for policies regarding the use of IT, which GCRB should refer to. These should be reviewed in-line with GCRB's policy and procedural review cycle.

3. Data Protection Impact Assessments (DPIA's)

There have been no DPIA's since September 2019 (BoardEffects).

4. Privacy Notices

GCRB's privacy notice was reviewed in 2021 and updated to reflect changes in data protection legislation following Brexit.

5. Data subject requests

GCRB have not received any Data Subject Requests during the period May 2018 – present.

6. Data incidents and breaches

There have been no data incidents or breaches reported.

7. Arrangements with external third parties

Data sharing agreements are set-up as required. Data processing agreements (i.e. the data protection elements of contracts) are reviewed when provided to the DPO. GCRB have 'in-kind' arrangements with its colleges for e.g. HR and Finance purposes. It has been advised that these are formalised to comply with Article 28 of UK GDPR where the college is acting as a processor on behalf of GCRB.

8. Staff training

The DPO delivered live on-line training to GCRB on 5/11/21 via Microsoft Teams. This covered the UK GDPR Principles, rights of the data subject, data incident and breach reporting. Additional advice was provided on compliance in relation to marketing and the Privacy and Electronic Communications Regulations (PECR), including written guidance on marketing and answering queries via email.

The DPO provided details to GCRB of sessions being run by HEFESTIS as part of Cyber Scotland Week, 28 Feb – 6 March. All sessions were free - [Events Archive - Cyber Scotland Week - Events](#).